

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON DIVISION**

JANE ROE,

Plaintiff,

Civ. Action No. 3:22-cv-00532

v.

**MARSHALL UNIVERSITY
BOARD OF GOVERNORS,**

Defendant.

STIPULATION REGARDING PLAINTIFF’S EMOTIONAL DISTRESS DAMAGES

The Plaintiff hereby stipulates that, by choosing not to submit any expert testimony about her psychological condition, she has knowingly limited her emotional damages claim to that which is available for “garden variety” emotional distress. At trial, Roe will ask the jury to award damages for the anxiety, grief, anger, and frustration she has felt and experienced as a result of Marshall’s actions and inactions. *Eller v. Prince George’s Cnty. Pub. Sch.*, No. 18-3649, 2019 WL 13108488, at *1 (D. Md. Oct. 18, 2019) (cleaned up).

Respectfully submitted, February 21, 2024

/s/ Kayla S. Reynolds

Ryan McCune Donovan (WVSB #11660)

Kayla S. Reynolds (WVSB #13268)

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